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May 5, 2023

VIA ECF ONLY

Hon. Brian M. Cogan, U.S.D.J.
U.S. District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Full Circle United, LLC v. Bay Tek Entm't, Inc., No. 1:20-cv-03395-BMC

Dear Judge Cogan:

We write on behalf of Defendant/Counterclaim Plaintiff Bay Tek Entertainment, Inc. (“Bay Tek”) to request an extension of time, from May 26, 2023 to June 9, 2023, to file Bay Tek’s Reply Memorandum in support of its Motion for Partial Summary Judgment, for the reasons set forth herein.

The current May 26, 2023 deadline was set by the Court on March 31, 2023 pursuant to a request from Bay Tek, following Bay Tek’s initial review of Plaintiff/Counterclaim Defendant Full Circle United, LLC’s and Counterclaim Defendant Eric Pavony’s (together, “FCU”) Opposition papers. This is the first extension that Bay Tek is seeking of the deadline to file its Reply Memorandum. FCU has indicated that it does not oppose this request.

Bay Tek respectfully submits that the current May 26, 2023 deadline for Bay Tek to file its Reply Memorandum be extended until June 9, 2023, for the following reasons.

- A key member of Bay Tek’s team primarily responsible for drafting the Reply Memorandum will be traveling internationally for business between May 7 and 14, 2023. During that time, that member will be largely unavailable to assist in drafting the motion and preparing supporting papers in response to FCU’s Opposition papers.
- Other members of Bay Tek’s team are simultaneously responding to FCU’s Rule 56.1 Counterstatement and addressing matters raised in FCU’s Response to Bay Tek’s Rule 56.1 Statement, which has turned out to require more work than originally anticipated given the amount of material submitted by FCU.
- One of Bay Tek’s team members remains on parental leave, which has affected staffing.
- Bay Tek has had to spend a great deal of time determining how best to frame and break down the issues raised in FCU’s Opposition papers and present Bay Tek’s responses. This also has ended up taking longer than Bay Tek originally anticipated.



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Accordingly, Bay Tek respectfully requests that it be permitted to file its Reply Memorandum in support of its Motion by **June 9, 2023**.

Bay Tek greatly appreciates the Court's consideration of this request.

Respectfully,

/s/ Mark C. Humphrey

Mark C. Humphrey
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